UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

Plaintiffs #1-21, individually and on behalf of all others similarly situated, Plaintiffs, v. THE COUNTY OF SUFFOLK; SUFFOLK COUNTY POLICE DEPARTMENT; COMMISSIONER EDWARD WEBBER, individually and in his official capacity; SUPERVISORY JOHN DOE DEFENDANTS, individually and in their official capacities; LIEUTENANT MILAGROS SOTO, individually and in her official capacity; SCOTT GREENE, individually and in his official capacity; OFFICER PODORMER, individually and in her official capacity; JOHN DOE DEFENDANTS, individually and in their official capacity, Defendants.	Case No. Date: April 29, 2015

DECLARATION OF NANCY M. TRASANDE
IN FURTHER SUPPORT OF PLAINTIFFS' MOTION TO PROCEED ANONYMOUSLY

I, NANCY M. TRASANDE, an attorney admitted to practice before this Court, declare the following to be true under penalty of perjury, pursuant to 28 U.S.C. § 1746:

1. I am Senior Counsel of LatinoJustice PRLDEF located at 99 Hudson Street, 14th Floor, New York, NY 10013-2815, which represents Plaintiffs #1-21 in this action.

2. I am familiar with the matters set forth herein, either from personal knowledge or on the basis of documents that have been provided to me.

3. I respectfully submit this Declaration in further support of *Plaintiffs' Motion to Proceed Anonymously* in order to place before the Court certain documents, which are annexed to this Declaration.

4. Exhibit #1 is a true and correct copy of a March, 2011 report published by the US Department of Commerce entitled "Overview of Race and Hispanic Origin: 2010", which charts the growth of the Hispanic/Latino race according to the 2010 US Census.

5. Exhibit #2 is a true and correct copy of a February 13, 2013 analysis published by the Suffolk County Planning and Environment Division entitled "Hispanic Population: Nassau and Suffolk Counties, New York", which details the dramatic increase in the Latino population between 1980 and 2010.

6. Exhibit #3 is a true and correct copy of a March 31, 2015 resource provided by the US Census Bureau entitled State and County QuickFacts, which provides demographic information for chosen cities based on current census data.

7. Exhibit #4 is a true and correct copy of a January 2015 report published by Eliminating Barriers to Racial Equity ("E.R.A.S.E.") entitled "Heading in the Wrong Direction: Growing School Segregation on Long Island", which details school segregation across Suffolk County and Long Island.

8. Exhibit #5 is a true and correct copy of an April 22, 2015 article entitled "Study: LI Still Among Most Segregated Regions in US" published by the Long Island Press detailing a study conducted by Brown-Florida State University, which shows Long Island is one of the most racially segregated regions in the US.

9. Exhibit #6 is a true and correct copy of a chart, last viewed April 27, 2015, published by Newsday in an article entitled "Long Island ranks high in deportation program", which shows that Suffolk County has the second highest deportation rate in New York State, second only to New York City.

10. Exhibit #7 is a true and correct copy of a November 21, 2008 report entitled

"Black and Latino Experiences with Discrimination on Long Island" written by Stony Brook University Center for Survey Research and published by E.R.A.S.E. The report details the results of a survey regarding Latinos' experiences with discrimination at the hands of Suffolk County residents and the Suffolk County Police Department.

11. Exhibit #8 is a true and correct copy of an October 28, 2010 survey entitled "Illegal Immigration Backlash Worries, Divides Latinos" conducted by the Pew Hispanic Research Center and which details Latinos' views on the causes and impact of discrimination.

12. Exhibit #9 is a true and correct copy of a September 2009 report published by the Southern Poverty Law Center entitled "Climate of Fear: Latino Immigrants in Suffolk County, N.Y." which details the harassment suffered by Latinos in Suffolk County, and how law enforcement officials and politicians have contributed to the climate of fear and anti-immigrant hatred.

13. Exhibit #10 is a true and correct copy of an April 6, 2015 online article published by News 12 Long Island entitled "KKK fliers found at Hampton Bays bank", which details the finding of KKK propaganda across Hampton Bays.

14. Exhibit #11 is a true and correct copy of a February 4, 2015 online article published by The Southampton Press entitled "More KKK Flyers Passed Out in Hampton Bays", which details the continued presence of the KKK across Hampton Bays.

15. Exhibit #12 is a true and correct copy of a September 18, 2014 online article published by Eyewitness News 7 entitled "More KKK Recruitment flyers found on Long Island", which details the finding of KKK propaganda across Long Island.

16. Exhibit #13 is a true and correct copy of an August 24, 2014 online article published by the Daily News entitled "KKK is using pamphlets to recruit in the Hamptons in

Long Island", which details KKK recruitment strategy for Hampton Bays.

17. Exhibit #14 is a true and correct copy of an October 22, 2000 article published by The New York Times entitled "Border Warriors", which details the activities of the Sachem Quality of Life Organization.

18. Exhibit #15 is a true and correct copy of a July 6, 2001 article published by The New York Times entitled "A Rising Long Island Voice in Immigration Debate", which details the activities of the Sachem Quality of Life Organization.

19. Exhibit #16 is a true and correct copy of a June 8, 2003 article published by The New York Times entitled "A Harder Line in Farmingville", which details the activities of the Sachem Quality of Life Organization.

20. Exhibit #17 is a true and correct copy of Brookhaven, N.Y., Code ch. 82, titled "Neighborhood Preservation", which places strict conditions on and imposes permit application fees for non-owner occupancy of rental property.

21. Exhibit 18 is a true and correct copy of Babylon, N.Y., Code ch. 153, titled "Multiple Dwellings", which places strict conditions on and imposes permit application fees for non-owner occupancy of rental property.

22. Exhibit #19 is a true and correct copy of an April 17, 2001 article published by Newsday entitled "Officials Must Stop Housing Bias Against Latinos", which details the housing bias against Latinos across Suffolk County and New York.

23. Exhibit 20 is a true and correct copy of Islip, N.Y., Code, ch. 68, art. L, titled "Rental Dwelling Units", which places strict conditions on and imposes permit application fees for non-owner occupancy of rental property.

24. Exhibit 21 is a true and correct copy of Southampton, N.Y., Code, ch. 270, titled

"Rental Properties", which places strict conditions on and imposes permit application fees for non-owner occupancy of rental property.

25. Exhibit #22 is a true and correct copy of a January 15, 2008 article published by The New York Times entitled "Crackdown on L.I. Landlords Is Criticized as Harassment of Immigrants", which details the harassment suffered by Latinos in Suffolk County due to the myriad housing code rules and regulations.

26. Exhibit 23 is a true and correct copy of Riverhead, N.Y., Code ch. 86, titled "Rental Dwelling Units", which places strict conditions on and imposes permit application fees for non-owner occupancy of rental property.

27. Exhibit #24 is a true and correct copy of the August 31, 2000 Suffolk County Legislature Introductory Resolution No. 1752-2000, Resolution No. 689-2000, which authorizes litigation against the US Immigration and Naturalization Service in an effort to ensure enforcement of federal deportation laws.

28. Exhibit #25 is a true and correct copy of the September 19, 2006 Suffolk County Legislature Introductory Resolution No. 2025-2006, Resolution No. 1056-2006, Local Law No. 52-2006, which requires companies doing business within Suffolk County to certify compliance with federal immigration laws.

29. Exhibit #26 is a true and correct copy of a November 4, 2007 article published in The New York Times entitled "The Riddle of Steve Levy", criticizing Suffolk County Executive Steve Levy's stance against undocumented workers and the formation of Mayors and Executives for Immigration Reform.

30. Exhibit #27 is a true and correct copy of an August 25, 2004 article published by Newsday entitled "Suffolk Sting Operation; Levy Targets Contractors; Tickets Issued By County

For Sales Tax, Other Violations, But Activists Fear Focus Will Be On Day Laborers", which details sting operations carried out against companies believed to be hiring undocumented workers.

31. Exhibit #28 is a true and correct copy of a September 16, 2008 article published by Newsday entitled "He was political trailblazer", which details the political career of Elie Mystal and his hostilities toward day laborers.

32. Exhibit #29 is a true and correct copy of a June 13, 2007 article published by The New York Times entitled "Suffolk's Leader Wins a Following on Immigration", which details then–Suffolk County Executive Steve Levy's support in Suffolk County based on his strong stance against undocumented workers.

33. Exhibit #30 is a true and correct copy of a March 7, 2007 article published by Newsday entitled "Anger Over New Bill; Most Speakers tell Suffolk Legislators They Oppose Plan to Crack Down on Laborer Gatherings", which details plans by Suffolk County legislators to pass an anti-loitering bill aimed at undocumented workers.

34. Exhibit #31 is a true and correct copy of the March 20, 2007 Suffolk County Introductory Resolution No. 1022-2007, Resolution No. 233-2007, which attempted to make it unlawful for individuals to stand along county roadways for the purpose of attempting to solicit products or services.

35. Exhibit #32 is a true and correct copy of a January 9, 2009 article published by The New York Times entitled "Latinos Recall Pattern of Attacks Before Killing", which details various hate crimes committed against Latinos in Suffolk County and the murder of an Ecuadorean immigrant in Suffolk County.

36. Exhibit #33 is a true and correct copy of a January 9, 2009 article published by

The New York Times entitled "Detailed Accounts of Attacks in Patchogue", which details various hate crimes committed against Latinos in Suffolk County.

37. Exhibit #34 is a true and correct copy of a November 21, 2008 article published by the New York Post entitled "Teens' Hate Spree Led To Murder: DA", which details the various crimes committed by the "Caucasian Crew."

38. Exhibit #35 is a true and correct copy of a November 11, 2008 article published by Newsday entitled "LI Hate Killing: 'Determined' to Cause Harm", which identifies that the "Caucasian Crew" were specifically targeting Latinos when committing their crime spree.

39. Exhibit #36 is a true and correct copy of a January 29, 2009 report published by the Department of Homeland Security entitled "Improving the Process for Victims of Human Trafficking and Certain Criminal Activity: The T and U Visa", which identifies the process for obtaining a U Visa and the application backlog.

I hereby declare that the foregoing statements made by me are true and correct. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: New York, New York
April 29, 2015

_/s/ Nancy M. Trasande____________
Nancy M. Trasande